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November 14, 2023

VIA ECF

Honorable Tonianne J. Bongiovanni, U.S.M.J.
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Federal Building & U.S.
Courthouse
402 East State Street, Room 4050
Trenton, New Jersey 08608

**Re: *AstraZeneca Pharmaceuticals LP et al. v. Natco Pharma Limited and
Natco Pharma Inc.***
Civil Action No.: 3:23-cv-00796 (RK) (TJB)

Dear Judge Bongiovanni:

This firm, together with Williams & Connolly LLP, represents Plaintiffs AstraZeneca Pharmaceuticals LP, AstraZeneca UK Limited, Kudos Pharmaceuticals Limited, The University of Sheffield, and MSD International Business GmbH (“Plaintiffs”) in the above-referenced matter. With Midlige and Richter LLC and Rakoczy Molino Mazzochi Siwik LLP, counsel for Defendants Natco Pharma Limited and Natco Pharma Inc. (“Defendants”), we write to respectfully request the following extensions and amendments to the Letter Order setting the schedule as to this matter. (ECF No. 31). The parties may have a further developed assessment of the scope of the disputes in this case following the submission of Defendants’ invalidity and noninfringement contentions as proposed on April 12, 2024, and may seek further adjustments to the events and dates proposed below following those submissions.

Event	Current Date	Proposed Date
Defendants’ Invalidity / Noninfringement Contentions with Accompanying Document Production	January 12, 2024	April 12, 2024
Status Conference		A day and time convenient for the Court the week of April 22, 2024 or April 29, 2024.
Plaintiffs’ Validity / Infringement Contentions with Accompanying Document Production	February 23, 2024	May 24, 2024
Exchange Claim Terms	March 8, 2024	June 14, 2024
Exchange Preliminary Claim Constructions and Intrinsic Evidence	March 22, 2024	June 28, 2024

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Exchange Rebuttal Intrinsic and Extrinsic Evidence	April 12, 2024	July 12, 2024
Status Conference		A day and time convenient for the Court the week of July 15, 2023.
Joint Claim Construction Chart	April 19, 2024	July 26, 2024
Complete Claim Construction Discovery	May 10, 2024	August 16, 2024
Opening Markman Briefs	June 7, 2024	September 13, 2024

If this is acceptable to the Court, we respectfully request that Your Honor “So-Order” this letter and direct its entry on the docket.

Should the Court would like to discuss this matter with the parties, the parties will make themselves available at the Court’s convenience. The parties thank the Court for its time and assistance in this matter.

Respectfully submitted,

s/ Charles H. Chevalier

Charles H. Chevalier

cc: All counsel of record (via ECF and email)